

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT _____

FILED

MAY 01 2019

Clerk, U. S. District Court
Eastern District of Tennessee
At Chattanooga

Regina Tate)
)
915 Oak Street)
)
Chattanooga, TN 37403)
)
Name of plaintiff (s))
)
v.)
)
Hamilton County Election Commission)
)
700 River Terminal Road)
)
Chattanooga, TN 37406)
)
Name of defendant (s))

Case No. 1:19-cv-127
(to be assigned by Clerk)
Greer / Steger

COMPLAINT

1. A short and plain statement of the grounds for filing this case in federal court (include federal statutes and/or U.S. Constitutional provisions, if you know them):

Title I of Americans with Disabilities Act of (1990), 42 U.S.C. § 1211, et seq

AS AMENDED

2. Plaintiff, Regina Tate resides at

915 Oak Street, Chattanooga
street address city

Hamilton, TN, 37403, 423-351-4284
county state zip code telephone number

(if more than one plaintiff, provide the same information for each plaintiff below)

3. Defendant, Hamilton County Election Commission lives at, or its business is located at
700 River Terminal Road, Chattanooga,
street address city
Hamilton, TN,
county state zip code

(if more than one defendant, provide the same information for each defendant below)

4. Short and plain statement of your claim (state as briefly as possible the facts of your case and how each defendant is involved. You may use additional paper if necessary):

Plaintiff provided the Defendant with documentation from plaintiff's medical provider
disclosing health information directly concerning the plaintiff's disability--making Defendant aware
of the Plaintiff's disability. In October 2015, the Defendant participated in the interactive process
by providing the plaintiff with reasonable accomodations of leave and adjustments to work
hours and job duties. Plaintiff was subsequently subjected to disciplines, suspensions, and an
extended probationary period in retaliation for scheduled doctor appointments related to Plaintiff's
disability. In March 2016, Plaintiff was terminated after requesting another reasonable
accomodation for leave due to the Plaintiff's disability and after Plaintiff provided the
the additional documentation as requested by the Defendant. February 2019 Plaintiff received
Notice of Right to Sue from U.S. Department of Justice after the charge was referred by the
Equal Employment Opportunity Commisson. Concilation efforts by EEOC were unsuccessful.

5. A demand for judgment for the relief you seek (list what you want the Court to do):

- a. Employment restored

- b. Compensatory damages (to include salary, overtime, and longevity pay,
and PTO that would have accumulated but for termination)

- c. Punitive damages to the extent allowable under the statute

- d. Employer provided benefits restored and made retroactive (Health, Dental, Vision,
long term disability, short term disability, and retirement).

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of my (our) information, knowledge and belief.

Signed this 1st day of May, 2019.

Begonia y. Tate
915 OAK st. Chatt. TN. 37408
(23) 351-4284

Signature of plaintiff (s)